

United States Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

OCT 24 2018

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

v.

FADI ISSA ISSA

NADAL DIYA

LABIB DEEB ARAFAT

MAXIMILIANO SANDOVAL ROMERO

LEATRICE MALIKA DE BRUHL-DANIELS

§
§
§
§
§
§
§
§
§

CRIMINAL NO. H-18-CR-199-S2

SECOND SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Willfully Filing False Tax Return)

On or about April 3, 2012, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

FADI ISSA ISSA,

did willfully make and subscribe a 2011 U.S. Individual Income Tax Return, IRS Form 1040, which defendant verified by a written declaration that it was made under the penalties of perjury, which defendant filed with the Internal Revenue Service, and which defendant did not believe to be true and correct with regard to every material matter in that defendant claimed on such return a business loss in the amount of \$50,230 (IRS Form 1040, line 12), total income in the amount of \$86,574 (IRS Form 1040, line 22) and a refund due of \$14,663 (IRS Form 1040, line 74a), whereas, as defendant then and there well knew and believed, such claimed amounts of business loss, total income and refund due were false.

In violation of Title 26, United States Code, Section 7206(1).

COUNT TWO
(Willfully Filing False Tax Return)

On or about February 19, 2013, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

FADI ISSA ISSA,

defendant herein, did willfully make and subscribe a 2012 U.S. Individual Income Tax Return, IRS Form 1040, which defendant verified by a written declaration that it was made under the penalties of perjury, which defendant filed with the Internal Revenue Service, and which defendant did not believe to be true and correct with regard to every material matter in that defendant claimed on such return business income in the amount of \$5,652 (IRS Form 1040, line 12), total income in the amount of \$158,738 (IRS Form 1040, line 22) and a refund due of \$1,216 (IRS Form 1040, line 74a), whereas, as defendant then and there well knew and believed, such claimed amounts of business income, total income and refund due were false.

In violation of Title 26, United States Code, Section 7206(1).

COUNT THREE
(Willfully Filing False Tax Return)

On or about August 26, 2017, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

FADI ISSA ISSA,

did willfully make and subscribe a 2012 U.S. Return of Partnership Income, IRS Form 1065, for the partnership GlobServ LLC, which defendant verified by a written declaration that it was made under the penalties of perjury, which defendant filed with the Internal Revenue Service, and which defendant did not believe to be true and correct with regard to every material matter in that defendant claimed on such return gross receipts or sales in the amount of \$8,100,000 (IRS Form 1065, line 1a) and an ordinary business loss in the amount of \$100 (IRS Form 1065, line 22), whereas, as defendant then and there well knew and believed, such claimed amounts of gross receipts or sales and ordinary business loss were false.

In violation of Title 26, United States Code, Section 7206(1).

COUNT FOUR
(Fraud and Misuse of Visas, Permits and Other Documents)

On or about November 20, 2013, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

MAXIMILIANO SANDOVAL ROMERO,

did knowingly obtain and possess a document prescribed by statute or regulation for entry into the United States, that is, a passport purporting to be issued by the country of Guatemala in the name of AYMAN OMAR HASSAN ABDELHAMID HASSOUNNA, which the defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT FIVE
(Fraud and Misuse of Visas, Permits and Other Documents)

On or about January 27, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

LABIB DEEB ARAFAT,

did knowingly obtain and possess a document prescribed by statute or regulation for entry into the United States, that is, a passport purporting to be issued by the country of Guatemala in the name of FADI ISSA ISSA, which the defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT SIX

(Fraud and Misuse of Visas, Permits and Other Documents)

On or about July 2, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant**,

FADI ISSA ISSA,

did knowingly use, possess and attempt to use a document prescribed by statute or regulation for entry into the United States, that is, a passport purporting to be issued by the country of Guatemala in the name of FADI ISSA ISSA, which the defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT SEVEN

(Fraud and Misuse of Visas, Permits and Other Documents)

On or about July 4, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant**,

FADI ISSA ISSA,

did knowingly use, possess and attempt to use a document prescribed by statute or regulation for entry into the United States, that is, a passport purporting to be issued by the country of Guatemala in the name of FADI ISSA ISSA, which the defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT EIGHT
(Fraud and Misuse of Visas, Permits and Other Documents)

On or about July 19, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendants,**

**NADAL DIYA and
LABIB DEEB ARAFAT,**

did knowingly use, possess and attempt to use a document prescribed by statute or regulation for entry into the United States, that is a passport purporting to be issued by the country of Guatemala in the name of NADAL DIYA, which each defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT NINE
(Fraud and Misuse of Visas, Permits and Other Documents)

On or about September 10, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

NADAL DIYA,

did knowingly use, possess and attempt to use a document prescribed by statute or regulation for entry into the United States, that is a passport purporting to be issued by the country of Guatemala in the name of NADAL DIYA, which the defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT TEN
(Forgery or False Use of Passport)

Between on or about January 1, 2014, and on or about February 28, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendants,**

LABIB DEEB ARAFAT and
FADI ISSA ISSA,

did willfully and knowingly furnish to another for use, a false, forged, counterfeited and altered passport or instrument purporting to be a passport, for the country of Guatemala and in the name of AYMAN OMAR HASSAN ABDELHAMID HASSOUNNA, which each defendant knew to be false, forged, counterfeited and altered.

In violation of Title 18, United States Code, Sections 1543 and 2.

COUNT ELEVEN
(Fraud and Misuse of Visas, Permits and Other Documents)

Between on or about August 28, 2014, and on or about August 23, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendants,**

LABIB DEEB ARAFAT and
NADAL DIYA,

did knowingly attempt to use a document prescribed by statute or regulation for entry into the United States, that is, a passport purporting to be issued by the country of Argentina in the name of NADAL DIYA, which each defendant knew to be forged, counterfeited and falsely made.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

COUNT TWELVE
(Tampering with a Witness, Victim, or an Informant)

On or about August 28, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

LABIB ARAFAT,

did corruptly attempt to obstruct, influence, and impede an official proceeding by attempting to bribe government officials with monies and other things of value in order to release for shipment overseas oilfield equipment previously seized or detained by United States Customs and Border Protection officers.

In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT THIRTEEN
(Tampering with a Witness, Victim, or an Informant)

Between on or about August 28, 2014, and on or about September 16, 2014, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

LABIB ARAFAT,

did corruptly attempt to obstruct, influence, and impede an official proceeding by attempting to bribe government officials with monies and other things of value in order to release for shipment overseas oilfield equipment previously seized or detained by United States Customs and Border Protection officers.

In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT FOURTEEN
(Tampering with a Witness, Victim, or an Informant)

On or about April 22, 2015, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

LABIB ARAFAT,

did corruptly attempt to obstruct, influence, and impede an official proceeding by attempting to bribe government officials with monies and other things of value in order to release for shipment overseas oilfield equipment previously seized or detained by United States Customs and Border Protection officers.

In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

COUNT FIFTEEN

(Tampering with a Witness, Victim, or an Informant)

Between on or about June 1, 2016, and on or about September 12, 2018, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, **defendant,**

LEATRICE MALIKA DE BRUHL-DANIELS,

did corruptly attempt to obstruct, influence, and impede an official proceeding by providing details of certain federal criminal investigations to NADAL DIYA, including that he is the target of those federal criminal investigations, the names of other targets of those federal criminal investigations, and that he would face arrest if he traveled to the United States.

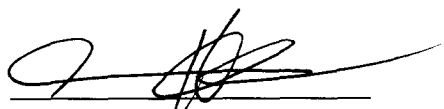
In violation of Title 18, United States Code, Sections 1512(c)(2) and 2.

A TRUE BILL:

Original Signature on File


FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK
UNITED STATES ATTORNEY


ALAMDAR S. HAMDANI
Assistant United States Attorney